

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**CASE NO. 23-80101-CR-CANNON-REINHART**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

DONALD J. TRUMP, et al.,

*Defendants.*

**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Gene C. Schaerr of the law firm of Schaerr Jaffe LLP, 1717 K Street NW, Suite 900, Washington, DC 20006, (202) 787-1060, for purposes of appearance as co-counsel on behalf of *Amici Curiae* Former Attorney General Edwin Meese III, Law Professors Steven Calabresi and Gary Lawson, Citizens United, and Citizens United Foundation in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Gene C. Schaerr to receive electronic filings in this case, and in support thereof states as follows:

1. Gene C. Schaerr is not admitted to practice in the Southern District of Florida and is a member in good standing of the bar of the District of Columbia and is admitted to practice before the United States Courts of Appeal for the First, Second, Third, Fourth, Fifth, Sixth,

Seventh, Eighth, Ninth, Tenth, Eleventh, District of Columbia, and Federal Circuits, and the United States District Courts for the District of Columbia and Maryland, and the United States Tax Court.

2. Movant, Edward H. Trent, Esquire, of the law firm of Schaerr Jaffe LLP, 1717 K Street NW, Suite 900, Washington, DC 20006, (202) 787-1060, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Gene C. Schaerr has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Gene C. Schaerr, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Gene C. Schaerr at email address: gschaerr@schaerr-jaffe.com.

WHEREFORE, Edward H. Trent, moves this Court to enter an Order granting Gene C. Schaerr permission to appear before this Court on behalf of *Amici Curiae* Former Attorney General Edwin Meese III, Law Professors Steven Calabresi and Gary Lawson, Citizens United, and Citizens United Foundation for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Gene C. Schaerr.

Date: March 11, 2024

Respectfully submitted,

/s/ Edward H. Trent

EDWARD H. TRENT (FSB #957186)

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*Former Attorney General*

*Edwin Meese III, Law Professors*

*Steven Calabresi and Gary Lawson,*

*Citizens United, and Citizens*

*United Foundation*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of March, 2024, I caused a true and correct copy of the foregoing to be served via ECF on all parties and counsel of record in this matter.

/s/ Edward H. Trent  
Edward H. Trent